

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

EPLUS, INC.,

Plaintiff,

v.

PERFECT COMMERCE, INC.,
SCIQUEST, INC., LAWSON
SOFTWARE, INC., and VERIAN
TECHNOLOGIES, INC.,

Defendants.

Civil Action No. 2:09-CV-232-HCM-TEM

**MOTION AND MEMORANDUM IN SUPPORT OF MOTION
FOR ENTRY OF PROTECTIVE ORDER**

The defendants Lawson Software, Inc. and Perfect Commerce, LLC (collectively “the Defendants”), by counsel, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, move this Court to enter a Protective Order and in support thereof state as follows:

1. This is a patent infringement case that will involve the discovery of information, some of which the parties consider confidential, trade-sensitive, and proprietary (collectively, “Confidential Information”).

2. The parties have agreed that the exchange of discovery would be facilitated by the entry of a protective order protecting this Confidential Information. Consequently, the parties have agreed to and are circulating the Agreed Protective Order attached to this Motion as **Exhibit A**. The Agreed Protective Order will be forwarded to the Court for consideration and entry as soon as it is fully endorsed.

3. All parties agree that the entry of the Protective Order will simplify the exchange of sensitive information while preserving its confidential, proprietary nature. Without the entry of such an order, there is a strong likelihood that irreparable harm would be caused to all parties to this action.

WHEREFORE, the Defendants, Lawson Software, Inc. and Perfect Commerce, LLC, by counsel, request that this Court enter the Agreed Protective Order attached to this Motion as **Exhibit A**.

Dated: August 25, 2009

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CERTIFICATE OF SERVICE

I hereby certify that on August 25, 2009, a true and correct copy of the foregoing document was served by electronic mail upon counsel for the plaintiff:

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